

Local Telephone Services – Internet & Broadband – Long Distance Security & Alarms – Data Center Services July 1, 2016

Ms. Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Dear Ms. Dortch:

Re: WC Docket No. 10-90, 11-42 and 14-58 -

FCC Form 481 due July 1, 2016 -

Whidbey Telephone Company (Study Area 522452)

Enclosed herewith for filing with the Federal Communications Commission ("Commission") is an unredacted copy of the FCC Form 481 (including the attachments thereto), due July 1, 2016, of Whidbey Telephone Company ("Company"), as filed electronically with the United States Administrative Company pursuant to Sections 54.313 and 54.422 of the Commission's rules, 47 C.F.R. §§ 54.313 and 54.422, and two redacted copies of that same document. These documents are being submitted in accordance with, and pursuant to and under the Protective Order issued by the Chief, Wireline Competition Bureau, released March 22, 2016, (DA 16-296) in WC Docket No. 10-90, *et al.* ("Protective Order"), with the former being a Stamped Confidential Document, as that term is defined in Paragraph 2 of the Protective Order, and with each of the latter being a Redacted Confidential Document, as that term is defined in Paragraph 2 of the Protective Order. Each of these documents has been stamped (marked) in accordance with the instructions set forth in Paragraph 5 of the Protective Order.

The information in this filing for which protected status under the Protective Order is being sought is limited to "Confidential Financial Information," as that term is defined in the Protective Order. The Company represents that to the best of the Company's knowledge, that information is not otherwise available from publicly available sources, that the Company has kept that information strictly confidential, and

Ms. Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission July 1, 2016 Page 2

that the information is subject to protection under FOIA and the Commission's implementing rules, and the Company claims that information constitutes some of its most sensitive business data which, if released to competitors or those with whom the Company does business, would allow those persons to gain a significant advantage in the marketplace or in negotiations.

Please let us know if the Commission has any questions regarding the accompanying FCC Form 481 documents.

Very truly yours,

Frank McIntyre Secretary/Treasurer

Enclosures:

FCC Form 481 - Stamped Confidential Document – 1 copy